

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                  )  
  )  
  )  
v.    )       Criminal No. 04-CR-10288-NG  
  )  
JOSEPH ALLEN                                 )

**MOTION TO ENLARGE TIME TO FILE A RESPONSE BRIEF TO DEFENDANT'S  
MOTION TO DISMISS THE COMPLAINT**

The United States of America, by its attorneys, Michael J. Sullivan, United States Attorney for the District of Massachusetts, and David G. Tobin, Assistant United States Attorney, respectfully requests that this Honorable Court permit the government to file its response brief to the Defendant's Motion to Dismiss the Complaint on or before October 13, 2004.

The defendant filed his Motion to Dismiss the Complaint on September 15, 2004. Pursuant to Local Rule 116.3(A), the government's response is due fourteen days later, on September 29, 2004. The government believes the interests of justice are served by the allowance of its Motion to Enlarge Time.

**CONCLUSION**

The government respectfully requests that this Court grant the government's motion.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ David G. Tobin  
DAVID G. TOBIN  
Assistant U.S. Attorney